

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

FOUR WOMEN HEALTH SERVICES, LLC,

Plaintiff,

v.

ABUNDANT HOPE PREGNANCY
RESOURCE CENTER INC., d/b/a
ATTLEBORO WOMEN'S HEALTH CENTER,
CATHERINE ROMAN, NICOLE CARGES,
and DARLENE HOWARD,

Defendants.

Civil Action No. 24-12283

**DECLARATION OF EMILY NASH IN SUPPORT OF
PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION**

In support of Plaintiff Four Women Health Services, LLC ("Four Women") motion for a preliminary injunction, I, Emily Nash, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney at the law firm of Foley Hoag LLP, 155 Seaport Boulevard, Boston, Massachusetts and a member in good standing of the bar of the Commonwealth of Massachusetts. I am counsel for Four Women in the above-captioned proceeding. I make this declaration based upon my personal knowledge.

2. In support of Four Women's motion for a preliminary injunction, I hereby attach Exhibits A through G, described below.

3. Attached hereto as **Exhibit A** is a true and accurate copy of an image capturing an October 30, 2023 exchange of messages between Jane Doe 5 and Four Women staff via Four Women's confidential patient-client communications system, hosted by Klara Technologies, Inc. ("Klara"). The image has been partially redacted to protect the personal information of the Four Women employees and their patients.

4. Attached hereto as **Exhibit B** is a true and accurate copy of an image capturing a May 1, 2024 exchange of messages between Jane Doe 6 and Four Women staff via Klara. The image has been partially redacted to protect the personal information of the Four Women employees and their patients.

5. Attached hereto as **Exhibit C** is a true and accurate copy of an image capturing a May 1, 2024 call at 10:11 a.m. from Defendant Abundant Hope Pregnancy Resource Center Inc., d/b/a Attleboro Women's Health Center ("AWHC") to Jane Doe 6. The image has been partially redacted to protect the personal information of the Four Women employees and their patients.

6. Attached hereto as **Exhibit D** is a true and accurate copy of a Crisis Pregnancy Center Complaint Form completed by Four Women while communicating with Jane Doe 6 about her interaction with AWHC.

7. Attached hereto as **Exhibit E** is a true and accurate copy of an image capturing an August 31, 2023 exchange of messages between Jane Doe 7 and Four Women staff via Klara. The image has been partially redacted to protect the personal information of the Four Women employees and their patients.

8. Attached hereto as **Exhibit F** is a true and accurate copy of an image capturing a May 6, 2024 exchange of messages between Jane Doe 8 and Four Women staff via Klara. The image has been partially redacted to protect the personal information of the Four Women employees and their patients.

9. Attached hereto as **Exhibit G** is a true and accurate copy of a May 11, 2024 Four Women Crisis Pregnancy Center Complaint Form completed by Jane Doe 8 describing her interaction with AWHC. The Complaint Form has been partially redacted to protect the personal information of the Four Women patient.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
September 5, 2024.

/s/ *Emily Nash*
Emily Nash